

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

HENRY NARANJO and
MARLENE RAMIREZ,

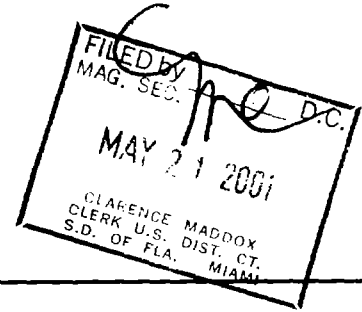
Case No.: 00-6022-CIV-LENARD

Plaintiffs,

vs.

STEPHEN BYRON SMITH,

Defendant.



NOTICE OF CLAIM OF LIEN
AND REQUEST TO BE PLACED ON
SERVICE OF MAILING

COMES NOW, TheZenith and gives notice that at the time of the incident described in the Complaint filed by the Plaintiffs, Henry Naranjo and Marlene Ramirez, TheZenith was the United States Longshore and Harbor Workers' Compensation Act claim insurance carrier for Bradford Marine, Inc., and has paid as of May 2, 2001 to Plaintiff, Henry Naranjo, the sum of \$185,201.04 excluding attorney's fees, penalties and interest. Pursuant to 33 U.S.C. §933, when a Claimant recovers from a third party, the Employer/Carrier has the right to receive its lien for benefits paid to the Claimant. The lien is applied to the net amount of the recovery after the payment of a reasonable attorney's fee and legal costs. It is therefore requested that no settlement monies or judgments be distributed to the Plaintiffs until such time as this Honorable Court adjudicates this lien and the continuing lien rights of TheZenith.

Further, it is requested that the undersigned be placed on the Parties' certificate of mailing and receive copies of all further pleadings.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by regular U.S.

Mail on May 9, 2001 to:

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